

# PSJ3

## Exhibit 682

1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF OHIO  
3 EASTERN DIVISION

4 - - -

5 IN RE: NATIONAL PRESCRIPTION  
6 OPIATE LITIGATION

Case No.

7 1:17-MD-2804

8 APPLIES TO ALL CASES

Hon. Dan A.

9 Polster

10 Case No. 1:17-MD-2804

11 - - -

12 January 9, 2019

13 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
14 CONFIDENTIALITY REVIEW

15 Videotaped deposition of

16 SOPHIA NOVACK, held at 101 Park Avenue,

17 New York, New York, commencing at 9:37 a.m.,

18 on the above date, before Marie Foley, a

19 Registered Merit Reporter, Certified

20 Realtime Reporter and Notary Public.

21 - - -

22 GOLKOW LITIGATION SERVICES

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1           A.       That was --

2                   MR. LAVELLE:   Object to form.

3                   MS. CHARLES:   Object to form.

4           A.       That was identified as needed  
5       for that store.   That was a prescriber  
6       that was prescribing out of that location.

7                   However, for that store at that  
8       time, we had deemed that it was needed for  
9       an increase for that location.

10                  MR. SIMMER:   Move to strike  
11       non-responsive.

12           Q.       My question was that volume that  
13       you requested the increase from McKesson,  
14       was that truly needed?

15                  MR. LAVELLE:   Object to form.

16                  MS. CHARLES:   Object to form.

17       BY MR. SIMMER:

18           Q.       You requested a 15 percent  
19       increase, and the reason for it was  
20       because of Dr. Harper.   It was right in  
21       that exhibit.

22                  Was that truly needed for Dr.  
23       Harper's increased utilization?

24                  MR. LAVELLE:   Object to form.

1 MS. CHARLES: Object to form.

2 A. That increase was needed for  
3 that location. The information was that  
4 one of the prescribers is Dr. Harper. So,  
5 we increased the threshold for that  
6 location for that store so that they can  
7 service the patients that are coming  
8 through.

9 Q. Ma'am, you're the one that  
10 introduced this concept of something being  
11 truly needed.

12 In the example we went through  
13 earlier today in which numerous patients  
14 died of overdoses, was that volume  
15 increase that you requested truly needed,  
16 yes or no?

17 MR. LAVELLE: Object to form.

18 Objection; asked and answered.

19 A. So, that increase was needed for  
20 that location and the patients that they  
21 were servicing. Ultimately, those  
22 prescriptions were dispensed by a  
23 pharmacist for a patient that they deemed  
24 had medical need.